

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(READING)**

IN RE:

Luz E. Delgado Elicier

Debtor(s).

CHAPTER 13

CASE NO.: 20-10602-pmm

**NOTICE OF ENTRY OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC dba Shellpoint Mortgage Servicing as servicer for Citibank, N.A., not in its individual capacity but solely as Owner Trustee for New Residential Mortgage Loan Trust 2018-3 ("Citibank N.A."), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given of filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Angela C. Pattison, Esq.
Hill Wallack LLP
1415 Route 70 East, Suite 309
Cherry Hill, NJ 08034
Telephone: 856-616-8086
Facsimile: 856-616-8081
Email: apattison@hillwallack.com

PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive

Citibank, N.A., not in its individual capacity but solely as Owner Trustee for New Residential Mortgage Loan Trust 2018-3 (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Citibank, N.A., not in its individual capacity but solely as Owner Trustee for New Residential Mortgage Loan Trust 2018-3 is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 10, 2024

Hill Wallack LLP

By: /s/ Angela C. Pattison

Angela C. Pattison, Esq.

Hill Wallack LLP

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Counsel to NewRez LLC dba Shellpoint Mortgage
Servicing as servicer for Citibank, N.A., not in its
individual capacity but solely as Owner Trustee for
New Residential Mortgage Loan Trust 2018-3

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CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance for NewRez LLC dba Shellpoint Mortgage Servicing as servicer for Citibank, N.A., not in its individual capacity but solely as Owner Trustee for New Residential Mortgage Loan Trust 2018-3 in the manner indicated below on April 10, 2024:

Luz E. Delgado Elicier
503 E. 5th Street
Bethlehem, PA 18015

Debtor

Via Regular Mail

Kevin K. Kercher
Law Office of Kevin K. Kercher, Esq, PC
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Suite C-2

Whitehall, PA 1805

Counsel for Debtor

Via ECF

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900 Market Street
Suite 320
Philadelphia, PA 19107
United States Trustee
Via ECF

Scott F. Waterman
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
Chapter 13 Trustee
Via ECF

By: /s/ Angela C. Pattison

Angela C. Pattison, Esq.,

Attorney ID 307611

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